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Monsanto

DETERGENTS/PHOSPHATES DIVISION

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Phone: (208) 547-3391

January 23, 1990

Mr. Hank Habicht
Deputy Administrator
U.S. Environmental Protection Agency
401 M Street, S.W.
Washington, D.C. 20460

Dear Mr. Habicht:

I very much appreciate your efforts to gain better insight to the environmental issues that we are facing in Idaho. I'm sure that your visit to Boise with Senator Symms will prove very helpful to us.

I was intrigued by your comments about Superfund when you stated that this program should be managed at local levels. If you remember, I spoke to you briefly after the meeting. At that time you volunteered to accept this letter and then pass it on to Mr. Don Clay, if appropriate.

On May 1, 1989, the Monsanto Soda Springs, Idaho plant site was proposed for listing on the NPL. Monsanto has always maintained a very good reputation of being environmentally responsible and is among the environmental leaders in Region 10. However, like most manufacturing facilities, the accepted operating practices of the 1950's are not environmentally acceptable now. A great deal of effort has been expended at this site to remediate environmental concerns resulting from early operations.

Monsanto has produced elemental phosphorus at the Soda Springs site since 1951. Voluntary environmental studies have indicated impact to the ground water from past operating practices and very extensive remedial programs have been implemented to address those concerns. The State of Idaho and EPA Region 10 have been kept informed and updated, as environmental impacts were determined and as solutions to address them completed. Needless to say, it was quite a shock to see this site proposed for Superfund listing.

The EPA contractor that conducted the site inspection in 1987 recommended to your agency the following:

"It is recommended that Monsanto Chemical Company continue to monitor ground water quality to ensure that the newly installed lined ponds and hydroclarifier are effective in preventing further ground water contamination and monitor temporal changes in ground water quality. Remedial actions may also be necessary to alleviate further contaminate migration if public drinking water supplies are threatened."

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More recent assessments by EPA contractors and the Agency of Toxic Substances and Disease Control have determined that there is no situation or material at the site that presents any immediate concern.

Most all of the data that was used to complete the site assessment was obtained from the extensive ground water assessments and monitoring studies completed by Monsanto. As the EPA contractor sampled drinking water supplies in the area, the water quality was tested to be within State and Federal Drinking Water Standards.

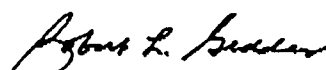
As we reviewed the HRS score given our site and prepared comments concerning the NPL proposal, many instances were identified where the HRS model requirements were not followed and critical data was interpreted incorrectly. Upon thorough review by Golder Associates, a hydrogeological consulting firm familiar with our site, a conservative HRS of 25.96 was determined to accurately represent the Monsanto Soda Springs site. This corrected score falls well below the cutoff requiring NPL concern or listing.

Meetings have been held to point out scoring errors, technical misinterpretations and legal issues regarding the proposed listing of this site at the State, EPA Idaho Operations, EPA Region 10, and with Mr. Larry Reed at EPA Headquarters. I am sending a copy of the HRS score as interpreted by Golder Associates (vs. the original EPA score) and a copy of the comments that were submitted regarding the proposed listing.

I would request that you discuss the listing of this site with Mr. Robie Russell, Region 10 Administrator. He has visited the site on several occasions and is very familiar with our operation and the efforts that Monsanto has made to comply with all environmental regulations.

I apologize for the length of this letter, but feel your help is very necessary to correct this situation. If I can be of any help in providing additional information, please contact me.

Sincerely,



Robert L. Geddes
Sr. Environmental Engineer

RLG/jw
Enclosures

cc: Robie Russell, Administrator
Region 10
1200 Sixth Ave.
Seattle, WA 98101

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